

ADT

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Dear Ms. Dortch: April, 9, 2007

Please consider this letter correction and clarification to certain statements and assumptions made by the director of the Safety Net: the National Safe & Strategic Technology Project at NNEDV regarding the use of alarm systems to assist survivors of domestic violence. This information relates to the potential impact the analog sunset would have on domestic violence victims who are using alarm systems.

The opinion expressed by the Safety Net project's director in her March 5,2007 letter to you should be carefully weighed with the knowledge that this project receives its primary funding from the wireless industry.

The statement that personal alarm systems were vital to victims in years past prior to widespread cell phone usage is erroneous. In fact, domestic violence advocates agree an arsenal of tools is needed to successfully wage war against domestic violence, including alann systems.

In truth, domestic violence shelters and survivors across the country rely on electronic security systems as much today as they have in year's past. This can be said with certainty, as ADT has offered the AWARE® (Abused Women's Active Response Emergency) Program nationwide since 1992. Through this program we provide free electronic home security systems, emergency (hold up) necklace pendants and system monitoring to victims of domestic violence. As noted in ADT's October 4, 2006 comments, the AWARE program has been established in no less than 170 communities, including but not limited to the major metropolitan areas of Atlanta, Denver, Detroit, New York, San Francisco, Seattle, St. Louis and Pittsburgh, as well as multitudes of smaller cities and towns throughout the country. We have seen no decrease in the number of US communities requesting the program over the years. For more than fifteen years, through the AWARE Program, ADT has worked closely with law enforcement, prosecutor's offices and social service organizations, including shelters and victim witness programs. Never have any of these professionals referred to the components of this life-saving service as obsolete.

The issue at hand is not whether alarm systems are being used to help keep domestic violence victims safe from their abusers, but rather, whether those victims might be placed in harms way if the analog cellular systems in place are removed or become inoperable before appropriate digital technology is available to take their place.

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The analog alarm devices used by AWARE participants help assure the victim's safety should an abuser cut the phone line or take away their cellular phone.

An advantage of the ADT AWARE program over the use of cell phones exclusively is that AWARE clients are given a priority response from law enforcement. Also, it is not necessary to dial a phone and wait for a response, while under attack. The press of a single button sends an immediate silent alarm signal. Further, it is not necessary for the victim to explain their circumstances or identify their whereabouts, as it is with a cell phone. Recently, a West Virginia woman was rescued from her abuser through the AWARE Program. The victim's ex-husband had a knife to her throat, rendering her incapable of speaking. Without the ADT system making help available with a push of the button on her alarm pendant, she would most likely not be alive today. She could not have used a cell phone to rescue her from her abuser.

Thousands of victims of serious domestic violence have benefited from the AWARE Program. Tens of thousands of other victims who subscribe to alarm services without formally participating in the AWARE program have benefited as well. Each such victim is dependant on their ADT alarm systems for safety and peace of mind. It is for these victims as well that we are concerned about the analog sunset deadline.

We appreciate your attention to this letter.

Sincerely,

Ann Lindstrøm

Director, Corporate Communications

ADT Security Services, Inc.